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McCulley
Frick &
Gilman, inc

December 2, 1994

Mr. Fred Austin
Puget Sound Air Pollution Control Agency
110 Union, Suite 500
Seattle, WA 98101

Dear Fred,

As we discussed yesterday, Ash Grove Cement Company has proposed several changes in the air pollution control equipment inventory for its Seattle plant. With this letter, I would like to identify these changes so you can update your records and SIP modeling.

Ash Grove recently submitted two Notices of Construction for baghouse projects at the plant. The first NOC (submitted November 10) covers the proposed replacement of the two main finish mill baghouses, designated as (7) in your 11/4/94 emission inventory (file name PM10ASH3.XLS). The new main finish mill baghouses would each have a capacity of 77,000 acfm, which would be an increase over the existing capacity of 16,800 acfm per baghouse. As part of this project, Ash Grove would also replace two finish mill baghouses that control emissions from the feed belts, identified as (8) in your inventory. The new baghouses would each have a capacity of 10,000 acfm, which would be an increase over the existing capacity of 3,864 acfm per baghouse. Finally, the NOC covers a new 5,000 acfm baghouse to control emissions while filling the feed bins. The existing baghouses have emission limits of 0.05 gr/dscf; the new baghouses would be limited to 0.005 gr/dscf.

A NOC submitted November 22 covers the proposed installation of a 20,000 acfm baghouse to control emissions from a new clinker crusher. This baghouse would control particulate matter to 0.005 gr/dscf.

I would also like to confirm a correction that was made in the 11/4/94 emission inventory. That inventory correctly identifies the flow rates in Fuller baghouse 38 as 20,600 acfm. Please note this correction does not represent any change in current Ash Grove activities, but merely corrects an error in your records.

The attached table summarizes these changes and corrections. With the proposed increase in baghouse collection efficiency, there would be a net reduction in particulate matter emissions even with the increase in flow rates.

Please feel free to call if I can provide additional assistance or clarification.

Sincerely,
McCulley, Frick & Gilman, Inc.

Eric Hansen

Eric Hansen
Atmospheric Sciences Group

bcc Jerry Brown, Hans Stuch

Ash Grove Cement Company: Baghouse Inventory Update

Control Equipment	Explanation	Temp.(F)	Existing @ 0.05/0.01			Proposed/Corrected @ 0.005		
			ACFM	SCFM[1]	PM lb/hr	ACFM	SCFM[1]	PM lb/hr
7. (2) Finish mill baghouses	Replacement	180	33,600	27,825	11.93	154,000	127,531	5.47
8. (2) Finish mill baghouses	Replacement	90	7,728	7,447	3.19	20,000	19,273	0.83
Finish mill feed bin baghouse	New	90				5,000	4,818	0.21
Clinker crusher baghouse	New	90				20,000	19,273	0.83
38. Fuller baghouse	Correction	180	3,202	2,652	0.23	20,600	17,059	0.73
Total			44,530	37,924	15.34	219,600	187,954	8.06

[1] ACFM corrected to a temperature of 70°F

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